

1 The Honorable Christopher M. Alston  
2 Chapter 11  
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8 UNITED STATES BANKRUPTCY COURT  
9 WESTERN DISTRICT OF WASHINGTON

10 In re

11 NORTHWEST TERRITORIAL MINT, LLC,

12 Debtor.  
13

No. 16-11767-CMA

OBJECTION TO MOTION FOR ORDER  
SHORTENING TIME

14 ROSS HANSEN objects to the Trustee's EX PARTE MOTION TO SHORTEN TIME  
15 ON MOTION FOR ORDER AUTHORIZING THE AUCTION AND SALE, ETC. (ECF No.  
16 1353), as follows:

17 First, the Trustee now admits that the Debtor's business has not been viable under his  
18 management since last spring, i.e., nearly a year ago. It thus appears that the Trustee assumed  
19 the lease for the Dayton facility at a time when he knew that the business was in significant  
20 trouble. Now the Trustee claims that an emergency requires him to liquidate key assets of the  
21 estate on an expedited basis. If the Trustee's current liquidation plan proceeds, it appears that  
22 the Debtor's estate will be burdened with a large lease rejection claim that is entitled to  
23 administrative priority status. Other than vague generalities, the Trustee's papers do not offer  
24 any hint about the anticipated return from the emergency auction.

25 Second, while the Trustee has historically rebuffed every effort by Mr. Hansen and  
26 others with whom he deals to come up with a better solution than liquidation of the Debtor, Mr.  
27 Hansen recently arranged for submission of an offer that would provide significant cash to the

1 estate, reduce the administrative burden of the Hoffs' administrative claim, and provide for the  
2 re-employment of some of the Debtor's former employees. A copy of the proposal advanced  
3 on behalf of Alternative Logistics LLC is attached to the Declaration of Ross Hansen in  
4 Opposition to Motion to Shorten Time. The Trustee did not respond to the offer, and has not  
5 permitted Mr. Hansen or Mr. Parrish, who owns Alternative Logistics, to inspect the Debtor's  
6 premises. The Alternative Logistics' proposal would substantially reduce or eliminate the  
7 Hoffs' administrative claim.

8 The Court should reject the attempt by the Trustee to liquidate the remaining assets of  
9 this Debtor without full disclosure. The Court should require the Trustee to disclose which  
10 assets remain in the estate, the estimated recovery from his proposed liquidation program, and  
11 the impact of that program on creditors of the estate. If it is inclined to shorten time, the Court  
12 should nevertheless require the Trustee (i) to make full disclosure of the assets remaining in the  
13 estate, and (ii) provide Mr. Hansen and Mr. Parrish with access to the Debtor's business  
14 premises for the purpose of inspecting the assets and participating in the process.

15  
16 DATED this 22nd day of January, 2018.

17 Davis Wright Tremaine LLP  
18 Attorneys for Ross Hansen

19 By /s/ Ragan L. Powers  
20 Ragan L. Powers, WSBA #11935

1 **PROOF OF SERVICE**

2 I certify that on January 22, 2018, I electronically filed the foregoing with the Clerk of  
3 the Court using the CM/ECF system, which will send notification of such filing to those  
4 attorneys of record registered on the CM/ECF system:

5 DATED this 22nd day of January, 2018.

6  
7 /s/ Ragan L. Powers

8 Ragan L. Powers, WSBA #11935  
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